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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

CIVIL ACTION NO. _____

In Re Application Of

MESA POWER GROUP, LLC

Applicant

pursuant to 28 U.S.C. § 1782
For Judicial Assistance in
Obtaining Evidence from SAMSUNG
C&T AMERICA, INC., KYO IN CHOO
and JIN GOO KWON For Use in a
Foreign and International
Proceeding

CERTIFICATION OF COUNSEL IN SUPPORT OF
APPLICATION PURSUANT TO 28 U.S.C. § 1782

I, Matthew P. O'Malley, of full age, hereby certify and
say:

1. I am an attorney-at-law licensed to practice before
this Court and am a partner at the law firm of Tompkins,
McGuire, Wachenfeld & Barry, LLP, Four Gateway Center, 100

Mulberry Street, Newark, New Jersey 07102, local counsel for applicant Mesa Power Group, LLC ("Mesa").

2. I make this Certification in support of Mesa's Application Pursuant to 28 U.S.C. § 1782.

3. Annexed hereto as Exhibit A is a true and correct copy of a proposed Subpoena to Samsung C&T America, Inc. ("Samsung").

4. Annexed hereto as Exhibit B is a true and correct copy of a proposed Subpoena to Samsung President Kyo In Choo.

5. Annexed hereto as Exhibit C is a true and correct copy of a proposed Subpoena to Samsung Treasurer Jin Goo Kwon.

6. Annexed hereto as Exhibit D is a true and correct copy of the unreported decision of In re Oxus Gold PLC, 2006 WL 2927615 (D.N.J. Oct. 11, 2006).

7. Annexed hereto as Exhibit E is a true and correct copy of the unreported decision of In re Oxus Gold PLC, 2007 WL 1037387 (D.N.J. Apr. 2, 2007).

8. Annexed hereto as Exhibit F is a true and correct copy of the unreported decision of In re Republic of Ecuador, 2010 WL 37002427 (N.D. Cal. Sept. 15, 2010).

9. Annexed hereto as Exhibit G is a true and correct copy of the unreported decision of Ukrnafta v. Carpatsky Petroleum Corp., 2009 WL 2877156 (D. Conn. Aug. 27, 2009).

10. Annexed hereto as Exhibit H is a true and correct copy of the unreported decision of In re Republic of Ecuador, 2011 WL 3495993 (D. Colo. Aug. 9, 2011).

11. Annexed hereto as Exhibit I is a true and correct copy of the unreported decision of Comision Ejecutiva, Hidroelectrica Del Rio Lempa v. Nejapa Power Co., 2008 WL 4809035 (D. Del. Oct. 14, 2008).

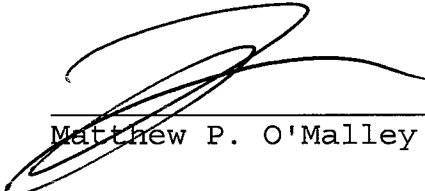
12. Annexed hereto as Exhibit J is a true and correct copy of the unreported decision of In re St. Jude Medical, Inc., 2002 WL 341019 (D. Minn. Mar. 1, 2002).

13. Annexed hereto as Exhibit K is a true and correct copy of the unreported decision of Positran Mfg., Inc. v. Diebold, Inc., 2003 WL 21104954 (D. Del. May 15, 2003).

I certify that the foregoing statements made by me are true. If any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated:

11-15-2011



Matthew P. O'Malley